

EXHIBIT 16

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December 8, 2016

Via Electronic Mail

Stacey Grigsby
Boies, Schiller & Flexner LLP
5301 Wisconsin Ave. NW
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Re: *Le et al. v. Zuffa, LLC*, Case No. 2:15-cv-01045-RFB-PAL (D.
Nev.)

Dear Stacey,

I write in response to your letter dated December 5, 2016, in which you state Zuffa's intention to claw back certain documents on the basis that they are privileged attorney-client communications. Plaintiffs believe the documents you identified are not privileged communications. Accordingly, Plaintiffs intend to file a motion to challenge Zuffa's assertion of attorney-client privilege for ZFL-1014103, ZFL-1014102, ZFL-1014078, ZFL-1014047, ZFL-1014045 and ZFL-0550804. Pursuant to Section 11 of the Revised Stipulation and Protective Order (Dkt. 217) we have sequestered these documents so that no attorney can access them, but have retained a copy of each for the purpose of challenging the designations with the Court.

Please let me know when you are available to meet and confer regarding these documents next week.

Sincerely,



Kevin E. Rayhill